

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
NORTHERN DIVISION AT KNOXVILLE**

In re Steven R. Standifer,
Debtor.

Case No. 3:20-bk-30270-SHB
Chapter 7

John P. Newton, Trustee
Plaintiff,

v.

Adv. Proc. No. 3:21-ap-03029-SHB

Peggy F. Standifer,
Defendant.

ANSWER OF DEFENDANT

COMES NOW Peggy F. Standifer, Defendant (hereinafter the "Defendant"), by and through counsel submits his Answer to the Plaintiff's Complaint:

1. The allegations of paragraph 1 of the Complaint are admitted.
2. The allegations of paragraph 2 of the Complaint are admitted.
3. The allegations of paragraph 3 of the Complaint are admitted.
4. The allegations of paragraph 4 of the Complaint are admitted.
5. The allegations of paragraph 5 of the Complaint are admitted.
6. The allegations of paragraph 6 of the Complaint are admitted.
7. The allegations of paragraph 7 of the Complaint are denied as written. The

reference document speaks for itself. The remaining allegations contained in paragraph 7 of the Complaint are denied and strict proof is demanded thereof.

8. The allegations of paragraph 8 of the Complaint are denied.
9. The allegations of paragraph 9 of the Complaint are denied.

10. The allegations contained in paragraph 10 of the Complaint are denied.
11. The allegations contained in paragraph 11 of the Complaint are denied.
12. The allegations contained in paragraph 12 of the Complaint are denied.
13. The allegations contained in paragraph 13 of the Complaint are denied.
14. The allegations contained in paragraph 14 of the Complaint are denied.
15. The allegations contained in paragraph 15 of the Complaint are denied.
16. The allegations contained in paragraph 16 of the Complaint are denied.
17. The allegations contained in paragraph 17 of the Complaint are denied.
18. The allegations contained in paragraph 18 of the Complaint are denied.
19. For the first affirmative defense, the Plaintiff's Complaint has failed to state claim upon which relief may be granted.
20. The Defendant reserves the right to amend this Answer to assert additional affirmative defenses after engaging in discovery as permitted by the Federal Rules of Civil Procedure.

Respectfully submitted,

/s/ Ryan E. Jarrard
Ryan E. Jarrard, Esquire
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CERTIFICATE OF SERVICE

I hereby certify that on this the 30th of July 2021, a copy of the foregoing Answer, was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

John P. Newton
Via ECF

/s/ *Ryan E. Jarrard*
Ryan E. Jarrard, BPR 024525